



**EPEAT Clarification #11**

**Does Verification Requirement “c) description of module change method” need to predate the declaration of optional criterion 4.4.2.2?**

**This Clarification applies to the following IEEE Standards and criteria:**

**Applicable Standards:**

- IEEE 1680.1 – Computers and Displays
- IEEE 1680.2 – Imaging Equipment
- IEEE 1680.3 – Televisions

**Applicable Criteria**

4.4.2.2

**PVC Determination:**

While some criteria require paperwork that pre-dates a declaration, this particular criterion, 4.4.2.2, does not, since the requirement for this criterion is met by the design and manufacture of the product.

**PVC Note 11:** This clarification raises a larger question about which criteria require predated documents within the IEEE1680.1 Standard. The PVC recommends that the EPEAT Staff review and make recommendations regarding declaration timing for all Verification Criteria within the standard.

**Background Analysis:**

Each criterion within the IEEE 1680 family of standards specifies a performance requirement. Some performance requirements may be met by the design and manufacture of the product or package, while some may require the Subscriber to take a specific action prior to declaring the criterion (e.g., communicating to the purchaser, preparing a report, or having a program in place.)

Each criterion in the 1680 family of standards also contains verification requirements to support a Subscriber's declaration. Verification requirements do not state whether documentation must be dated prior to declaring to a criterion, or if a post-declaration date is acceptable. Further, the IEEE family of standards does not require that a Subscriber have all the documentation compiled prior to declaration. Rather, Subscribers are required to submit the verification documentation upon request.

For several verifications in the past few years, the “date” of the verification documentation has come into question, and the PVC has at times ruled that the date on the documentation must pre-date the product declaration. PVC rulings on this issue have hinged on the nature of the performance requirement. For example, if the criterion could reasonably be determined to require that a report or program be available or information be communicated to the purchaser prior to their purchasing decision, then the verification documentation must pre-date the product declaration since the Subscriber declared that the specific action or item existed at the

time they declared to the criterion. This is necessary to prevent Subscribers from taking action retroactively, only after the initiation of a verification round.

Upon examination of the Verification Requirement for criterion 4.4.2.2, EPEAT Staff recommends that the module change method need not pre-date the declaration to this criterion. This performance requirement is met by the design and manufacture of the product, which predated the sale of the product.

**Change History:**

Created: December 2011